

**PRIVILEGED & CONFIDENTIAL WORK PRODUCT  
PREPARED AT THE REQUEST OF LEGAL COUNSEL**

May 9, 2003

Kedari Reddy, Esq.  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York, NY 10007-1866

**Re: Tierra Solutions, Inc. ("Tierra") Passaic River PRP Document Repository**

Dear Ms. Reddy,

As you know, EI Group assists Tierra in maintaining the USEPA's Passaic River Document Repository in Newark. In that connection, I am writing to request information regarding the enforcement status of the Passaic River Study Area (PRSA) potentially responsible parties (PRPs) listed below.

It is the understanding of EI Group that USEPA previously issued a CERCLA 104(e) Request for Information in 1996 to each of the listed PRPs. Reviewing the current Passaic River Document Repository Index it appears that no information has been received by us from USEPA to date regarding any responses to these 104(e) Requests.

Please advise us as to the PRP response status, and availability for the document repository for each of the following:

- CERCLA 104(e) Requests for Information issued April 30, 1996
  - Conus Chemical (Arkansas Chemical Complex)
  - Sonneborn & Sons
  - Universal International Industries
  - Vulcan Materials Corporation
- CERCLA 104(e) Requests for Information issued July 15, 1996
  - Synfax Manufacturing
- CERCLA 104(e) Requests for Information issued August 20, 1996

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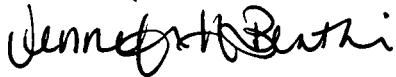
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- Charles F. Guyon & Company
  - City of Newark – Newark Housing 900 McCarter
  - City of Newark – Police Firing Range
  - A. Gross & Company
  - Joseph Supor & Sons Trucking
  - Prestolite
  - Revere Smelting
- CERCLA 104(e) Requests for Information issued December 24, 1996
  - Engelhard Industries
  - Moyer Plating

As USEPA has previously agreed, it has been our practice not to release to the Passaic River Document Repository the case files of any PRPs, who have been sent, but who have not yet responded to a CERCLA 104(e) Request For Information concerning the Passaic River Study Area. We plan to continue this practice and, therefore, not to release the above PRPs' case files to the document repository until such time as we receive from USEPA, for placement in the repository, whatever USEPA views to be said PRPs' adequate response to their respective 104(e) Requests.

If you have any questions please do not hesitate to contact me at (908) 901-0112 or via email at [jbenthin@intell-group.com](mailto:jbenthin@intell-group.com), or you may contact Tierra's outside counsel, Paul W. Herring, Esq. at Andrews & Kurth L.L.P. at (214) 659 – 4504.

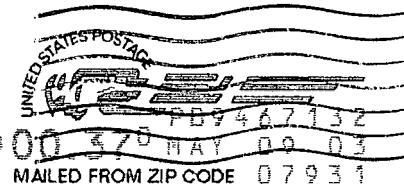
Sincerely,



Jennifer H. Benthin  
Senior Analyst

cc: Rick McNutt, Tierra Solutions, Inc.  
Paul W. Herring, Andrews & Kurth L.L.P.

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